UNITED STATES DISTRICT COURT	
SOUTHERN DISTRICT OF NEW YORK	K

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Actava TV, Inc., Master Call Communications, Inc., Master Call Corporation, and Rouslan Tsoutiev,

18-CV-06626 (ALC)

Plaintiffs,

-against-

Joint Stock Company "Channel One Russia Worldwide," Closed Joint Stock Company "CTC Network," Closed Joint Stock Company "New Channel", Limited Liability Company "Rain TV-Channel," Closed Joint Stock Company "TV DARIAL," Limited Liability Company "Comedy TV," and Kartina Digital GmbH

NOTICE OF MOTION

Defendants.	

PLEASE TAKE NOTICE that upon the annexed Declaration of Raymond J. Dowd dated February 5, 2021, the Memorandum of Law in Support and all the prior proceedings in this matter, all Defendants by and through their attorneys, will move this Court before the Honorable Kevin Nathaniel Fox at the United States Courthouse located at 40 Foley Square, New York, New York 10007 on a date and time designated by the Court for an order compelling Plaintiffs/Counterclaim Defendants Actava TV, Inc., Master Call Corporation, and Rouslan Tsoutiev (collectively "Actava") to produce documents.

PLEASE TAKE FURTHER NOTICE that opposition papers must be served in accordance with Local Rule 6.1 or as otherwise directed by the Court.

Dated: New York, New York February 5, 2021

Respectfully submitted,

DUNNINGTON BARTHOLOW & MILLER LLP Attorneys for Joint Stock Company Channel One Russia Worldwide

By: /s Raymond J. Dowd
Raymond J. Dowd

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